

Brush, Jason

From: Brush, Jason
Sent: Wednesday, September 11, 2013 2:36 PM
To: Goldmann, Elizabeth; Leidy, Robert
Subject: Fw: Suggested language for monitoring proposals

From: Linda C. Taunt
Sent: Wednesday, September 11, 2013 1:54:23 PM
To: Bose, Laura; Brush, Jason
Subject: FW: Suggested language for monitoring proposals

FYI

From: Linda C. Taunt
Sent: Wednesday, September 11, 2013 1:54 PM
To: 'msvogel@fs.fed.us'
Cc: Dennis L. Turner; Debra L. Daniel; Michael A. Fulton
Subject: FW: Suggested language for monitoring proposals

Mindi - as promised here are our comments on Rosemont's surface water and groundwater monitoring proposals. These proposals were developed to supply data need to detect potential impacts from the mine development project on springs, regional streams, especially the OAW reach of Davidson Canyon, and to evaluate future groundwater quantity and quality changes to Davidson Canyon that could alter spring flows. The list of parameters to be analyzed is substantial and we believe are adequate for determining potential impacts and long term changes in water quality and quantity. ADEQ would request the following:

1. The frequency of type of monitoring should be clearly articulated in the EIS, wherever is appropriate (e.g., Appendix B). The monitoring plans state that frequency will be called out in the sampling analysis plans but ADEQ would request the frequency be memorialized in the EIS. Specifically, ADEQ would request that ambient surface water flows and springs flows be measured monthly and surface water and spring water quality parameters be sampled when flow is present but not more often than quarterly. Recognizing the intermittent nature of these systems, anytime flow is present at a sampling location, ADEQ would request that water quality samples be taken. If flow is present multiple times in a quarter, the expectation is a minimum of one sample per quarter.
2. ADEQ also requests the following language regarding detection limits be included with the monitoring information:
"Rosemont shall use analytical methods with a Limit of Quantitation (LOQ) that is lower than the lowest surface water standards applicable to the receiving water. For sampling in or immediately upstream of the OAW a

method with a detection level below the background quality of the OAW for the parameter analyzed shall be use. If all methods have LOQs higher than applicable water quality standard or background quality level, the approved analytical method with the lowest LOQ shall be used."